

Agency D&L
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July 25, 2019

Gloria Guohong Zhang
BioVision, Inc.
155 South Milpitas Boulevard
Milpitas, California 95035

Re: **60-DAY NOTICE OF VIOLATION OF CALIFORNIA LAW**
D&L File No. 61234.7

Dear Ms. Zhang,

Your company is in violation of California's Proposition 65, "The Safe Drinking Water and Toxic Enforcement Act of 1986." We represent Maria Elizabeth Romero, a California resident and concerned citizen who intends to file suit against you in the public interest if this matter is not resolved within 60 days.

Enclosed with this letter for your information is a copy of a Proposition 65 Summary prepared by California's Office of Environmental Health Hazard Assessment.

BioVision, Inc. ("BioVision") sells high-purity chemical products directly to consumers via the Web site located at <https://www.biovision.com>. "Listed Chemicals" are those substances which the State of California has recognized as causing cancer, birth defects, or other reproductive harm. The following products are sold by BioVision via the referenced Web site without adequate warning, in violation of the requirements of Proposition 65.

PRODUCTS:	All products sold by BioVision via the referenced Web site which contain a Listed Chemical in a purity of 10 percent or higher, whether in solid form or in solution.
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ROUTES OF EXPOSURE:	Dermal contact, ingestion and inhalation
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DATES OF EXPOSURE:	Between August 31, 2018 and July 25, 2019
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Since August 30, 2018, California law has required that a clear and reasonable warning be provided to consumers buying any product online which contains a Listed Chemical, prior to completion of the purchase. Manufacturers have primary responsibility for ensuring that compliant warnings are provided at all stages of the supply chain. Sales of the referenced products to educational institutions in California without adequate warnings have resulted in the exposure of individuals in the State to Listed Chemicals as described.

Enclosed with this letter as Attachments “B” and “C,” respectively, are a non-exhaustive list of products sold by SCC in violation of Proposition 65, and a list of Listed Chemicals for which violations are alleged. Attachment B is provided for reference only and contains a list of example products offered for sale on the referenced site, which contain Listed Chemicals whose names begin with the letters A or B.

Your violation of California law exposes BioVision to substantial civil liability. A court may impose penalties of up to \$2,500 *per day* for each violation. With more than 300 days having passed since regulations requiring online warnings became effective on August 31, 2018, and online offerings for thousands of its products violating the law, BioVision’s potential liability is enormous.

The purpose of Proposition 65 is to protect the citizens of the State of California from unwitting exposure to reproductive harm and carcinogenic substances. Accordingly, private settlement of this matter will require your agreement to: (1) provide Proposition 65-compliant warnings to California residents prior to internet sales of products containing Listed Chemicals; and (2) require that any entity in the supply chain for consumer sales of your products also provide compliant warnings – or to cease all sales to residents of California. Any settlement agreement will also contain an enforcement mechanism providing for substantial penalties in case of non-compliance.

Attached hereto is an executed Certificate of Merit regarding BioVision’s violation of Proposition 65 described above. The Attorney General of the State of California, all District Attorneys in the State, and City Attorneys for California cities with more than 750,000 residents have received a copy of this Notice and may bring suit against you within 60 days of the date of this Notice. Any settlement of the violations described above is subject to approval by the Attorney General of the State of California.

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To prevent the necessity of resolving this matter through litigation, we would be grateful for your prompt attention to these matters.

Very truly yours,



Benjamin D. Weston

Enclosures:

Proposition 65 Summary (BioVision copy only)

Attachment B

Attachment C

Certificate of Merit

Statement of Facts (A.G. copy only)

Service List

CCs:

See Service List

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ATTACHMENT B PRODUCTS CONTAINING LISTED CHEMICALS

PRODUCT AND URL	LISTED CHEMICAL
1. Actinomycin D, >98%, at https://www.biovision.com/actinomycin-d-10-mm.html .	1. Actinomycin D
2. Retinoic Acid, ≥98%, at https://www.biovision.com/retinoic-acid.html .	2. All-trans retinoic acid
3. Altretamine, ≥98%, at https://www.biovision.com/altretamine-22261.html .	3. Altretamine
4. Amikacin Disulfate, Assay purity, at https://www.biovision.com/amikacin-disulfate.html .	4. Amikacin sulfate
5. DL-Aminoglutethimide, ≥98%, at https://www.biovision.com/dl-aminoglutethimide.html .	5. Aminoglutethimide
6. Hygromycin B, ≥90%, at https://www.biovision.com/hygromycin-b.html .	6. Aminoglycosides
7. EZSolution™ Hygromycin B, ≥90%, at https://www.biovision.com/ezsolutiontm-hygromycin-b.html .	7. Aminoglycosides
8. Tobramycin, ≥94%, at https://www.biovision.com/tobramycin.html .	8. Aminoglycosides
9. Tobramycin Sulfate, 634-739 µg/mg, at https://www.biovision.com/tobramycin-sulfate.html .	9. Aminoglycosides
10. Amikacin Disulfate, 674 - 786 µg/mg, at https://www.biovision.com/amikacin-disulfate.html .	10. Aminoglycosides
11. Apramycin Sulfate, ≥550 µg/mg, at https://www.biovision.com/apramycin-sulfate.html .	11. Aminoglycosides
12. Amikacin, ≥98%, at https://www.biovision.com/amikacin.html .	12. Aminoglycosides
13. Neomycin sulfate, ≥90%, 25 or 100 g, at https://www.biovision.com/neomycin-sulfate-17169.html .	13. Aminoglycosides
14. Gentamicin sulfate, ≥590 µg/mg, 1 to 25 g, at https://www.biovision.com/gentamicin-sulfate-16401.html .	14. Aminoglycosides
15. Paromomycin Sulfate, ≥675 u/mg, at https://www.biovision.com/paromomycin-sulfate.html .	15. Aminoglycosides
16. Kanamycin Sulfate, USP, >95%, at https://www.biovision.com/kanamycin-sulfate-usp.html .	16. Aminoglycosides
17. Streptomycin Sulfate, >700 IU/mg, at https://www.biovision.com/streptomycin-sulfate.html .	17. Aminoglycosides
18. G418 Sulfate, >720 U/mg, at https://www.biovision.com/g418-sulfate.html .	18. Aminoglycosides
19. Amiodarone Hydrochloride, ≥98%, at https://www.biovision.com/amiodarone-hydrochloride.html .	19. Amiodarone hydrochloride
20. Amsacrine, ≥98%, at https://www.biovision.com/amsacrine-22320.html .	20. Amsacrine
21. ACE2 Inhibitor, DX600, ≥95%, at https://www.biovision.com/ace2-inhibitor-dx600-17244.html .	21. Angiotensin converting enzyme (ACE) inhibitors
22. Captopril, ≥98%, at https://www.biovision.com/captopril-14823.html .	22. Angiotensin converting enzyme (ACE) inhibitors
23. Perindopril t-Butylamine Salt, ≥98%, at https://www.biovision.com/perindopril-t-butylamine-salt.html .	23. Angiotensin converting enzyme (ACE) inhibitors
24. Benazepril hydrochloride, ≥98%, at https://www.biovision.com/benazepril-hydrochloride.html .	24. Angiotensin converting enzyme (ACE) inhibitors
25. Auranofin, ≥98%, at https://www.biovision.com/auranofin.html .	25. Auranofin
26. 5-Azacytidine, >95%, at https://www.biovision.com/5-azacytidine.html .	26. Azacitidine
27. Azathioprine, ≥98%, at https://www.biovision.com/azathioprine.html .	27. Azathioprine
28. Busulfan, ≥97%, at https://www.biovision.com/busulfan.html .	28. 1,4-Butanediol dimethanesulfonate (Busulfan)

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Attachment C: Listed Chemicals

A-alpha-C (2-Amino-9H-pyrido[2,3-b]indole)	Benz[a]anthracene	Chlordiazepoxide
Abiraterone acetate	Benzene	Chlordiazepoxide hydrochloride
Acetaldehyde	Benzidine [and its salts]	Chlordimeform
Acetamide	Benzidine-based dyes	Chlorendic acid
Acetazolamide	Benzodiazepines	Chlorinated paraffins (Average chain length, C12; approximately 60 percent chlorine by weight)
Acetochlor	Benzo[b]fluoranthene	P-Chloroaniline-Chloroaniline
Acetohydroxamic acid	Benzo[k]fluoranthene	p-Chloroaniline hydrochloride-p-Chloroaniline hydrochloride
2-Acetylaminofluorene	Benzofuran	Chloroethane (Ethyl chloride)
Acifluorfen sodium	Benzophenone	1-(2-Chloroethyl)-3-cyclohexyl-1-nitrosourea (CCNU) (Lomustine)
Acrylamide	Benzo[a]pyrene	1-(2-Chloroethyl)-3-(4-methylcyclohexyl)-1-nitrosourea (Methyl-CCNU)
Acrylonitrile	Benzotrichloride	Chloroform
Actinomycin D	Benzphetamine hydrochloride	Chloromethyl methyl ether (technical grade)
AF-2;[2-(2-furyl)-3-(5-nitro-2-furyl)]acrylamide	Benzyl chloride	3-Chloro-2-methylpropene
Aflatoxins	Benzyl violet 4B	1-Chloro-4-nitrobenzene
Alachlor	Beryllium and beryllium compounds	4-Chloro-o-phenylenediamine
Alcoholic beverages	Betel quid with tobacco	Chloroprene
Alcoholic beverages, when associated with alcohol abuse	Betel quid without tobacco	2-Chloropropionic acid
Aldrin	Bevacizumab	Chlorothalonil
All-trans retinoic acid	2,2-Bis(bromomethyl)-1,3-propanediol	P-Chloro-o-toluidine
Aloe Vera, non-decolorized whole leaf extract	Bis(2-chloroethyl)ether	p-Chloro-o-toluidine, strong acid salts of p-Chloro-o-toluidine
Alprazolam	N,N-Bis(2-chloroethyl)-2-naphthylamine (Chlornapazine)	5-Chloro-o-toluidine and its strong acid salts
Altretamine	Bis(chloroethyl)nitrosourea (BCNU) (Carmustine)	Chlorotrianisene
Amantadine hydrochloride	Bis(2-chloro-1-methylethyl)ether, technical grade	p-chloro- α,α,α -trifluorotoluene (para-Chlorobenzotrifluoride, PCBTF)
Amikacin sulfate	Bisphenol A (BPA)	Chlorozotocin
2-Aminoanthraquinone	Bitumens, extracts of steam-refined and air refined	Chlorpyrifos
P-Aminoazobenzene	Bracken fern	Chromium (hexavalent compounds)
O-Aminoazotoluene	Bromacil lithium salt	Chrysene
4-Aminobiphenyl (4-aminodiphenyl)	Bromate	C.I. Acid Red 114
1-Amino-2,4-dibromoanthraquinone	Bromochloroacetic acid	C.I. Basic Red 9 monohydrochloride
3-Amino-9-ethylcarbazole hydrochloride	Bromodichloroacetic acid	C.I. Direct Blue 15
2-Aminofluorene	Bromodichloromethane	C.I. Direct Blue 218
Aminoglutethimide	Bromoethane	C.I. Disperse Yellow 3
Aminoglycosides	Bromoform	C.I. Solvent Yellow 14
1-Amino-2-methylantraquinone	1-Bromopropane (1-BP)	Ciclosporin (Cyclosporin A; Cyclosporine)
2-Amino-5-(5-nitro-2-furyl)-1,3,4-thiadiazole	2-Bromopropane (2-BP)	Cidofovir
4-Amino-2-nitrophenol	Bromoxynil	Cinnamyl anthranilate
Aminopterin	Bromoxynil octanoate	Cisplatin
Amiodarone hydrochloride	Butabarbital sodium	Citrus Red No. 2
Amitraz	1,3-Butadiene	Cladribine
Amitrole	1,4-Butanediol dimethanesulfonate (Busulfan)	Clarithromycin
Amoxapine	Butylated hydroxyanisole	Clobetasol propionate
Amsacrine	Butyl benzyl phthalate (BBP)d	Clofibrate
Anabolic steroids	beta-Butyrolactone	Clomiphene citrate
Analgesic mixtures containing Phenacetin	Cacodylic acid	Clorazepate dipotassium
Androstenedione	Cadmium	CMNP (pyrazachlor)
Angiotensin converting enzyme (ACE) inhibitors	Cadmium and cadmium compounds	Cobalt metal powder
Aniline	Caffeic acid	Cobalt [II] oxide
Aniline hydrochloride	Captafol	Cobalt sulfate
o-Anisidine-o-Anisidine	Captan	Cobalt sulfate heptahydrate
o-Anisidine hydrochloride	Carbamazepine	Cocaine
Anisindione	Carbaryl	Coconut oil diethanolamine condensate (cocamide diethanolamine)
Antraquinone	Carbazole	Codeine phosphate
Antimony oxide (Antimony trioxide)	Carbon black (airborne, unbound particles of respirable size)	Coke oven emissions
Aramite	Carbon-black extracts	Colchicine
Areca nut	Carbon disulfide	Conjugated estrogens
Aristolochic acids	Carbon monoxide	Creosotes
Arsenic (inorganic arsenic compounds)	Carbon tetrachloride	p-Cresidine
Arsenic (inorganic oxides)	Carboplatin	Cumene
Asbestos	N-Carboxymethyl-N-nitrosourea	Cupferron
Aspirin	Catechol	Cyanazine
Atenolol	Ceramic fibers (airborne particles of respirable size)	Cycasin
Atrazine	Certain combined chemotherapy for lymphomas	Cycloate
Auramine	Chenodiol	Cycloheximide
Auranofin	Chloral	Cyclopenta[cd]pyrene
Avermectin B1 (Abamectin)	Chloral hydrate	Cyclophosphamide (anhydrous)
Azacitidine	Chlorambucil	Cyclophosphamide (hydrated)
Azaserine	Chloramphenicol sodium succinate	Cyhexatin
Azathioprine	Chlorcyclizine hydrochloride	
Azobenzene	Chlordane	
Barbiturates	Chlordecone (Kepone)	
Beclomethasone dipropionate		
Benomyl		
Benthiavalicarb-isopropyl		

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Cytarabine	Diltiazem hydrochloride	Ethylbenzene
Cytembena	3,3'-Dimethoxybenzidine (o-Dianisidine)	Ethyl dipropylthiocarbamate
D&C Orange No. 17	3,3'-Dimethoxybenzidine dihydrochloride	Ethyl-4,4'-dichlorobenzilate
D&C Red No. 8	3,3'-Dimethoxybenzidine-based dyes metabolized to	Ethylene dibromide
D&C Red No. 9	3,3'-dimethoxybenzidine	Ethylene dichloride (1,2-Dichloroethane)
D&C Red No. 19	4-Dimethylaminoazobenzene	Ethylene glycol (ingested)
Dacarbazine	trans-2-[(Dimethylamino)methylimino]-5-[2-(5-nitro-2-furyl)vinyl]-1,3,4-oxadiazole	Ethylene glycol monoethyl ether
Daminozide	7,12-Dimethylbenz(a)anthracene	Ethylene glycol monoethyl ether acetate
Danazol	3,3'-Dimethylbenzidine (ortho-Tolidine)	Ethyleneimine (Aziridine)
Dantron (Chrysazin; 1,8-Dihydroxyanthraquinone)	3,3'-Dimethylbenzidine-based dyes metabolized to	Ethylene oxide
Daunomycin	3,3'-dimethylbenzidine	Ethylene thiourea
Daunorubicin hydrochloride	3,3'-Dimethylbenzidine dihydrochloride	Ethyl methanesulfonate
DDD (Dichlorodiphenyl-dichloroethane)	Dimethylcarbonyl chloride	Etodolac
DDE (Dichlorodiphenyl-dichloroethylene)	N,N-Dimethylformamide	Etoposide
DDT (Dichlorodiphenyl-trichloroethane)	1,1-Dimethylhydrazine (UDMH)	Etoposide in combination with cisplatin and
o,p'-DDT	1,2-Dimethylhydrazine	bleomycin
p,p'-DDT	2,6-Dimethyl-N-nitrosomorpholine (DMNM)	Etretinate
DDVP (Dichlorvos)	Dimethyl sulfate	Fenoxaprop ethyl
Demeclocycline hydrochloride (internal use)	N,N-Dimethyl-p-toluidineN	Fenoxycarb
Des-ethyl atrazine (DEA)	Dimethylvinylchloride	Filgrastim
Des-isopropyl atrazine (DIA)	Di-n-butyl phthalate (DBP)	Fluazifop butyl
N,N'-Diacetylbenzidine	Di-n-hexyl phthalate (DnHP)	Flunisolide
2,4-Diaminoanisole	M-Dinitrobenzenem	Fluorouracil
2,4-Diaminoanisole sulfate	O-Dinitrobenzeneo-Dinitrobenzene	Fluoxymesterone
2,4-Diamino-6-chloro-s-triazine (DACT)	P-Dinitrobenzenep-Dinitrobenzene	Flurazepam hydrochloride
4,4'-Diaminodiphenyl ether (4,4'-Oxydianiline)	3,7-Dinitrofluoranthene	Flurbiprofen
2,4-Diaminotoluene	3,9-Dinitrofluoranthene	Flutamide
Diazepam	1,3-Dinitropyrene	Fluticasone propionate
Diazoaminobenzene	1,6-Dinitropyrene	Fluvalinate
Diazoxide	1,8-Dinitropyrene	Folpet
Dibenz[a,h]acridine	2,4-Dinitrotoluene	Formaldehyde (gas)
Dibenz[a,j]acridine	2,6-Dinitrotoluene	2-(2-Formylhydrazino)-4-(5-nitro-2-furyl)thiazole
Dibenzanthracenes	Dinitrotoluene (technical grade)	Fumonisin B (1FumonisinB1)
Dibenz[a,c]anthracene	Dinitrotoluene mixture, 2,4-/2,6-	Furan
Dibenz[a,h]anthracene	Dinocap	Furazolidone
Dibenz[a,j]anthracene	Dinoseb	Furfuryl alcohol
7H-Dibenzo[c,g]carbazole	Di-n-propyl isocinchomeronate (MGK Repellent	Furmecyclo
Dibenzo[a,e]pyrene	326)Di-n-propyl isocinchomeronate (MGK Repellent	Fusarin C
Dibenzo[a,h]pyrene	326)Di-n-propyl isocinchomeronate (MGK Repellent	Gallium arsenide
Dibenzo[a,i]pyrene	326)	Ganciclovir
Dibromoacetic acid	1,4-Dioxane	Ganciclovir sodium
Dibromoacetonitrile	Diphenylhydantoin (Phenytoin)	Gasoline engine exhaust (condensates/extracts)
1,2-Dibromo-3-chloropropane (DBCP)	Diphenylhydantoin (Phenytoin), sodium salt	Gemfibrozil
2,3-Dibromo-1-propanol	Direct Black 38 (technical grade)	Gentian violet (Crystal violet)
Dichloroacetic acid	Direct Blue 6 (technical grade)	Glass wool fibers (inhalable and biopersistent)
P-Dichlorobenzenep-Dichlorobenzene	Direct Brown 95 (technical grade)	Glu-P-1 (2-Amino-6-methyldipyrdo[1,2- a:3',2'-
3,3'-Dichlorobenzidine	Disodium cyanodithioimidocarbonate	d]imidazole)
3,3'-Dichlorobenzidine dihydrochloride	Disperse Blue 1	Glu-P-2 (2-Aminodipyrdo[1,2-a:3',2'-d]imidazole)
1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene (DDE)	Diuron	Glycidaldehyde
1,4-Dichloro-2-butene	Doxorubicin hydrochloride (Adriamycin)	Glycidol
3,3'-Dichloro-4,4'-diamino-diphenyl ether	Doxycycline (internal use)	Glyphosate
1,1-Dichloroethane	Doxycycline calcium (internal use)	Goldenseal root powder
Dichloromethane (Methylene chloride)	Doxycycline hyclate (internal use)	Goserelin acetate
Dichlorophene	Doxycycline monohydrate (internal use)	Griseofulvin
Dichlorophenamide	Emissions from combustion of coal	Gyromitrin (Acetaldehyde methylformylhydrazone)
1,2-Dichloropropane	Emissions from high-temperature unrefined	Halazepam
1,3-Dichloro-2-propanol (1,3-DCP)	rapeseed oil	Halobetasol propionate
1,3-Dichloropropene	Endrin	Haloperidol
Diclofop-methyl	Environmental tobacco smoke (ETS)	Halothane
Diclofop methyl	Epichlorohydrin	HC Blue 1
Dicumarol	Epoxiconazole	Heptachlor
Dieldrin	Ergotamine tartrate	Heptachlor epoxide
Diepoxybutane	Erionite	Herbal remedies containing plant species of the
Diesel engine exhaust	Estradiol 17B	genus Aristolochia
Diethanolamine	Estragole	Hexachlorobenzene
Di(2-ethylhexyl)phthalate (DEHP)	Estrogens, steroidal	Hexachlorobutadiene
1,2-Diethylhydrazine	Estrogen-progestogen (combined) used as	Hexachlorocyclohexane (technical grade)
Diethylstilbestrol (DES)	menopausal therapy	Hexachlorocyclohexane (alpha isomer)
Diethyl sulfate	Estrone	Hexachlorocyclohexane (beta isomer)
Diflunisal	Estropipate	Hexachlorocyclohexane (gamma isomer)
Diglycidyl resorcinol ether (DGRE)	Ethinylestradiol	Hexachlorodibenzodioxin
Dihydroergotamine mesylate	Ethionamide	Hexachloroethane
Dihydrosafole	Ethoprop	2,4-Hexadienal (89% trans, trans isomer; 11% cis,
Di-isodecyl phthalate (DIDP)	Ethyl acrylate	trans isomer)
Diisononyl phthalate (DINP)	Ethyl alcohol in alcoholic beverages	Hexafluoroacetone
Diisopropyl sulfate		Hexamethylphosphoramide

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N-Hexane	8-Methoxypsoralen with ultraviolet A therapy	Nickel oxide
2,5-Hexanedione	2-Methylaziridine (Propyleneimine)	Nickel refinery dust from the pyrometallurgical process
Histrelin acetate	Methylazoxymethanol	Nickel subsulfide
Hydramethylnon	Methylazoxymethanol acetate	Nicotine
Hydrazine	Methyl bromide, as a structural fumigant	Nifedipine
Hydrazine sulfate	Methyl carbamate	Nimodipine
Hydrazobenzene (1,2-Diphenylhydrazine)	Methyl chloride	Niridazole
Hydrogen cyanide (HCN) and cyanide salts (CN salts)	3-Methylcholanthrene	Nitrapyrin
1-Hydroxyanthraquinone	5-Methylchrysene	Nitrilotriacetic acid
Hydroxyurea	4,4'-Methylene bis(2-chloroaniline)	Nitrilotriacetic acid, trisodium salt monohydrate
Idarubicin hydrochloride	4,4'-Methylene bis(N,N-dimethyl)benzenamine	5-Nitroacenaphthene
Ifosfamide	4,4'-Methylene bis(2-methylaniline)	o-Nitroanisoleo-Nitroanisoleo-Nitroanisoleo-Nitroanisoleo-Nitroanisole
Iodine-131	4,4'-Methylenedianiline	Nitrobenzene
Imazalil	4,4'-Methylenedianiline dihydrochloride	4-Nitrobiphenyl
Indeno[1,2,3-cd]pyrene	Methyleugenol	6-Nitrochrysene
Indium phosphide	Methylhydrazine and its salts	Nitrofen (technical grade)
IQ (2-Amino-3-methylimidazo[4,5-f] quinoline)	Methylhydrazine	2-Nitrofluorene
Iprodione	Methylhydrazine sulfate	Nitrofurantoin
Iprovalicarb	2-Methylimidazole	Nitrofurazone
Iron dextran complex	4-Methylimidazole	1-[(5-Nitrofurfurylidene)-amino]-2-imidazolidinone
Isobutyl nitrite	Methyl iodide	N-[4-(5-Nitro-2-furyl)-2-thiazolyl]acetamide
Isoprene	Methyl isobutyl ketone	Nitrogen mustard (Mechlorethamine)
Isoprazam	Methyl isobutyl ketone (MIBK)	Nitrogen mustard hydrochloride (Mechlorethamine hydrochloride)
Isotretinoin	Methyl isocyanate (MIC)	Nitrogen mustard N-oxide
Isoxaflutole	Methyl mercury	Nitrogen mustard N-oxide hydrochloride
Kresoxim-methyl	Methylmercury compounds	Nitromethane
Lactofen	Methyl methanesulfonate	2-Nitropropane
Lasiocarpine	Methyl-n-butyl ketone	1-Nitropyrene
Lead	2-Methyl-1-nitroanthraquinone (of uncertain purity)	4-Nitropyrene
Lead and lead compounds	N-Methyl-N'-nitro-N-nitrosoguanidine	N-Nitrosodi-n-butylamineN-Nitrosodi-n-butylamineN-Nitrosodi-n-butylamine
Lead acetate	N-Methylolacrylamide	N-Nitrosodiethanolamine
Lead phosphate	N-Methylpyrrolidone	N-Nitrosodiethylamine
Lead subacetate	α-Methyl styrene (alpha-Methylstyrene)	N-Nitrosodimethylamine
Leather dust	Methyltestosterone	p-Nitrosodiphenylaminep-Nitrosodiphenylaminep-Nitrosodiphenylamine
Leuprolide acetate	Methylthiouracil	N-Nitrosodiphenylamine
Levodopa	Metiram	N-Nitrosodiphenylamine
Levonorgestrel implants	Metronidazole	N-Nitrosodi-n-propylamineN-Nitrosodi-n-propylamine
Lindane and other hexachlorocyclohexane isomers	Michler's ketone	N-Nitroso-N-ethylurea
Linuron	Midazolam hydrochloride	N-Nitrosohexamethyleneimine
Lithium carbonate	Minocycline hydrochloride (internal use)	3-(N-Nitrosomethylamino) propionitrile
Lithium citrate	Mirex	4-(N-Nitrosomethylamino)-1-(3-pyridyl)-1-butanone
Lorazepam	Misoprostol	N-Nitrosomethyl-n-butylamine
Lovastatin	Mitomycin C	N-Nitrosomethyl-n-decylamine
Lynestrenol	Mitoxantrone hydrochloride	N-Nitrosomethyl-n-dodecylamine
Malathion	Molinate	N-Nitrosomethylethylamine
Malonaldehyde, sodium salt	MON 4660 (dichloroacetyl-1-oxa-4-azaspiro(4,5)-decane	N-Nitrosomethyl-n-heptylamine
Mancozeb	MON 13900 (furalazole)	N-Nitrosomethyl-n-hexylamine
Maneb	3-Monochloropropane-1,2-diol (3-MCPD)	N-Nitrosomethyl-n-nonylamine
Marijuana smoke	Monocrotaline	N-Nitrosomethyl-n-octylamine
Me-A-alpha-C (2-Amino-3-methyl-9H-pyrido[2,3-b]indole)	MOPP (vincristine-prednisone-nitrogen mustard-procarbazine mixture)	N-Nitrosomethyl-n-pentylamine
Mebendazole	5-(Morpholinomethyl)-3-[(5-nitrofurfuryl-idene)-amino]-2-oxazolidinone	N-Nitrosomethyl-n-propylamine
Medroxyprogesterone acetate	Mustard Gas	N-Nitrosomethyl-n-tetradecylamine
Megestrol acetate	MX (3-chloro-4-dichloromethyl-5-hydroxy-2(5H)-furanone)	N-Nitrosomethyl-n-undecylamine
MeIQ (2-Amino-3,4-dimethylimidazo[4,5-f]quinoline)	Myclobutanil	N-Nitroso-N-methylurea
MeIQx (2-Amino-3,8-dimethylimidazo[4,5-f]quinoxaline)	beta-Myrcene	N-Nitroso-N-methylurethane
Melphalan	Nabam	N-Nitrosomethylvinylamine
Menotropins	Nafarelin acetate	N-Nitrosomorpholine
Mepaniprim	Nafenopin	N-Nitrososarcosine
Meprobamate	Nalidixic acid	o-Nitrotoluene
2-Mercaptobenzothiazole	Naphthalene	Nitrous oxide
Mercaptopurine	1-Naphthylamine	Norethisterone (Norethindrone)
Mercury and mercury compounds	2-Naphthylamine	Norethisterone acetate (Norethindrone acetate)
Merphalan	Neomycin sulfate (internal use)	Norethisterone (Norethindrone) /Ethinyl estradiol
Mestranol	Netilmicin sulfate	Norethisterone (Norethindrone) /Mestranol
Metam potassium	Nickel (Metallic)	Norethynodrel
Methacycline hydrochloride	Nickel acetate	Norgestrel
Metham sodium	Nickel carbonate	Ochratoxin A
Methanol	Nickel carbonyl	Oil Orange SS
Methazole	Nickel compounds	
Methimazole	Nickel (soluble compounds)	
Methotrexate	Nickel hydroxide	
Methotrexate sodium	Nickellocene	
5-Methoxypsoralen with ultraviolet A therapy		

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Oral contraceptives, combined	Propazine	Thioacetamide
Oral contraceptives, sequential	beta-Propiolactone	4,4'-Thiodianiline
Oryzalin	Propoxur	Thiodicarb
Oxadiazon	Propylene glycol mono-t-butyl ether	Thioguanine
Oxazepam	Propylene oxide	Thiophanate methyl
Oxydemeton methyl	Propylthiouracil	Thiouracil
Oxymetholone	Pulegone	Thiourea
Oxymetholone	Pymetrozine	Thorium dioxide
Oxytetracycline (internal use)	Pyridine	Titanium dioxide (airborne, unbound particles of respirable size)
Oxytetracycline hydrochloride (internal use)	Pyrimethamine	Tobacco, oral use of smokeless products
Oxythioquinox (Chinomethionat)	Quazepam	Tobacco smoke
Paclitaxel	Quinoline and its strong acid salts	Tobacco smoke (primary)
Palygorskite fibers (> 5µm in length)	Quizalofop-ethyl	Tobramycin sulfate
Panfuran S	Radionuclides	Toluene
Paramethadione	Reserpine	Toluene diisocyanate
Parathion	Residual (heavy) fuel oils	o-Toluidineo-Toluidineo-Toluidine
Penicillamine	Resmethrin	o-Toluidine hydrochlorideo-Toluidine hydrochlorideo-Toluidine hydrochloride
pentabromodiphenyl ether mixture [DE-71 (technical grade)]	Retinol/retinyl esters, when in daily dosages in excess of 10,000 IU, or 3,000 retinol equivalents.	Topiramate
Pentachlorophenol	Ribavirin	Toxaphene (Polychlorinated camphenes)
Pentachlorophenol and by-products of its synthesis (complex mixture)	Riddelline	Toxins derived from Fusarium moniliforme (Fusarium verticillioides)
Pentobarbital sodium	Rifampin	Treosulfan
Pentosan polysulfate sodium	Safrole	Triadimefon
Pentostatin	Salted fish, Chinese-style	Triamterene
Perfluorooctane sulfonate (PFOS)	Secobarbital sodium	Triazolam
Perfluorooctanoic acid (PFOA)	Sedaxane	S, S, S-Tributyl phosphorotrithioate (Tribufos, DEF)
Pertuzumab	Selenium sulfide	Tributyltin methacrylate
Phenacetide	Sermorelin acetate	Trichlormethine (Trimustine hydrochloride)
Phenacetin	Shale-oils	Trichloroacetic acid
Phenazopyridine	Silica, crystalline (airborne particles of respirable size)	Trichloroethylene
Phenazopyridine hydrochloride	Simazine	2,4,6-Trichlorophenol
Phenesterin	Sodium dimethyldithiocarbamate	1,2,3-Trichloropropane
Phenobarbital	Sodium fluoroacetate	Trientine hydrochloride
Phenolphthalein	Soots, tars, and mineral oils (untreated and mildly treated oils and used engine oils)	Triforine
Phenoxybenzamine	Spirodiclofen	Trilostane
Phenoxybenzamine hydrochloride	Spironolactone	Trimethadione
Phenprocoumon	Stanozolol	2,4,5-Trimethylaniline and its strong acid salts
o-Phenylenediamine and its salts	Sterigmatocystin	Trimethyl phosphate
Phenyl glycidyl ether	Streptomycin sulfate	Trimetrexate glucuronate
Phenylhydrazine and its salts	Streptozocin (streptozotocin)	TRIM® VX
o-Phenylphenate, sodiumo-Phenylphenate, sodiumo-Phenylphenate, sodium	Streptozotocin (streptozocin)	2,4,6-Trinitrotoluene (TNT)
o-Phenylphenolo-Phenylphenolo-Phenylphenol	Strong inorganic acid mists containing sulfuric acid	Triphenyltin hydroxide
Phenylphosphine	Styrene	Tris(1-aziridinyl)phosphine sulfide (Thiotepa)
PhiP(2-Amino-1-methyl-6-phenylimidazol[4,5-b]pyridine)	Styrene oxide	Tris(2-chloroethyl) phosphate
Pimozide	Sulfallate	Tris(2,3-dibromopropyl)phosphate
Pioglitazone	Sulfasalazine (Salicylazosulfapyridine)	Tris(1,3-dichloro-2-propyl) phosphate (TDCPP)
Pipobroman	Sulfur dioxide	Trp-P-1 (Tryptophan-P-1)
Pirimicarb	Sulindac	Trypan blue (commercial grade)
Plicamycin	Talc containing asbestiform fibers	Unleaded gasoline (wholly vaporized)
Polybrominated biphenyls	Tamoxifen and its salts	Uracil mustard
Polychlorinated biphenyls	Tamoxifen citrate	Urethane (Ethyl carbamate)
Polychlorinated biphenyls (containing 60 or more percent chlorine by molecular weight)	Temazepam	Urofollitropin
Polychlorinated dibenzo-p-dioxinsPolychlorinated dibenzo-p-dioxins	Teniposide	Valproate (Valproic acid)
Polychlorinated dibenzofurans	Terbacil	Vanadium pentoxide (orthorhombic crystalline form)
Polygeenan	Teriparatide	Vinblastine sulfate
Ponceau MX	Terrazole	Vinclozolin
Ponceau 3R	Testosterone and its esters	Vincristine sulfate
Potassium bromate	Testosterone cypionate	Vinyl bromide
Potassium dimethyldithiocarbamate	Testosterone enanthate	Vinyl chloride
Pravastatin sodium	Tetrabromobisphenol A	4-Vinylcyclohexene
Prednisolone sodium phosphate	3,3',4,4'-Tetrachloroazobenzene	4-Vinyl-1-cyclohexene diepoxide (Vinyl cyclohexenedioxide)
Primidone	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)	Vinyl fluoride
Procarbazine	1,1,2,2-Tetrachloroethane	Vinylidene chloride
Procarbazine hydrochloride	Tetrachloroethylene (Perchloroethylene)	(1,1-Dichloroethylene)
Procymidone	p-a,a,a-Tetrachlorotoluenep-a,a,a-	Vinyl trichloride (1,1,2-Trichloroethane)
Progesterone	Tetrachlorotoluenep-a,a,a-Tetrachlorotoluenep-a,a,a-Tetrachlorotoluene	Vismodegib
Pronamide	Tetrachlorvinphos	Warfarin
Propachlor	Tetracycline (internal use)	Wood dust
1,3-Propane sultone	Tetracyclines (internal use)	2,6-Xylidine (2,6-Dimethylaniline)
Propargite	Tetracycline hydrochloride (internal use)	Zalcitabine
Propargite	Tetrafluoroethylene	Zidovudine (AZT)
	Tetranitromethane	Zileuton
	Thalidomide	

July 25, 2019

CERTIFICATE OF MERIT (BioVision, Inc.)
(Health and Safety Code Section 25249.7(d))

I, Benjamin D. Weston, hereby declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the parties identified in the notices have violated California Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings.
2. I am the attorney for the noticing party.
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposures to the listed chemicals that are the subject of the action.
4. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.
5. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), *i.e.*, (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: July 25, 2019



Benjamin D. Weston

Certificate of Service

I, Chris Johnson, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 498 Calle Principal, Monterey, California 93940.

2. On July 25, 2019, I served the following documents:
- 60-Day Notice of Violation (with Attachments A, B and C)
 - Certificate of Merit

on the following party by the method described below:

Gloria Guohong Zhang
BioVision, Inc.
155 South Milpitas Boulevard
Milpitas, California 95035

3. On July 25, 2019, I served the following documents:
- 60-Day Notice of Violation (with Attachments B and C)
 - Certificate of Merit

on each of the parties on the service list attached hereto by the method described below.

BY MAIL: I deposited such envelope in the mail at Monterey, California, with postage thereon fully prepaid. I am readily familiar with my company's practice of preparing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that service is presumed invalid if the postal cancellation date or postage meter date is more than one (1) day after date of my signature below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: July 25, 2019

Chris Johnson

I, Benjamin D. Weston, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 1968 South Coast Highway, Suite 1200, Laguna Beach, CA 92651.

2. On July 25, 2019, I served the following documents:

- 60-Day Notice of Violation
- Certificate of Merit

on the following persons by causing a true and correct .PDF copy thereof to be sent via electronic mail to the parties listed below, pursuant to Cal. Code Regs., title. 27, § 25903(c)(1):

Alameda County District Attorney CEPDProp65@acgov.org	Calaveras County District Attorney Prop65Env@co.calaveras.ca.us
Contra Costa County District Attorney sgrassini@contracostada.org	Inyo County District Attorney inyoda@inyocounty.us
Lassen County District Attorney mlatimer@co.lassen.ca.us	Monterey County District Attorney Prop65DA@co.monterey.ca.us
Napa County District Attorney CEPD@countyofnapa.org	Riverside County District Attorney Prop65@rivcoda.org
Sacramento County District Attorney Prop65@sacda.org	San Diego City Attorney CityAttyProp65@sandiego.gov
San Diego County District Attorney CityAttyCrimProp65@sandiego.gov	San Francisco County District Attorney gregory.alker@sfgov.org
San Francisco City Attorney Valerie.Lopez@sfcityattys.org	San Joaquin County District Attorney DA DAConsumer.Environmental@sjcda.org
San Luis Obispo County District Attorney edobroth@co.slo.ca.us	Santa Barbara County District Attorney DAProp65@co.santa-barbara.ca.us
Santa Clara County District Attorney EPU@da.sccgov.org	Santa Cruz County District Attorney Prop65DA@santacruzcounty.us
Sonoma County District Attorney jbarnes@sonoma-county.org	Tulare County District Attorney Prop65@co.tulare.ca.us
Ventura County District Attorney daspecialops@ventura.org	Yolo County District Attorney cfepd@yolocounty.org

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: July 25, 2019

Benjamin D. Weston

List for Service by Mail

Alpine County District Attorney
P.O. Box 248
Markleeville, CA 96120

Amador County District Attorney
708 Court Street #202
Jackson, CA 95642

Butte County District Attorney
25 County Center Drive, Suite 245
Oroville, CA 95965

Colusa County District Attorney
346 Fifth Street, Suite 101
Colusa, CA 95932

Del Norte County District Attorney
450 H Street, Room 171
Crescent City, CA 95531

El Dorado County District Attorney
515 Main Street
Placerville, CA 95667

Fresno County District Attorney
2220 Tulare Street, Suite 1000
Fresno, CA 93721

Glenn County District Attorney
P.O. Box 430
Willows, CA 95988

Humboldt County District Attorney
825 5th Street, 4th Floor
Eureka, CA 95501

Imperial County District Attorney
940 West Main Street, Suite 102
El Centro, CA 92243

Kern County District Attorney
1215 Truxtun Avenue, 4th Floor
Bakersfield, CA 93301

Kings County District Attorney
1400 West Lacey Boulevard
Hanford, CA 93230

Lake County District Attorney
255 North Forbes Street
Lakeport, CA 95453

Los Angeles County District Attorney
211 West Temple Street
Suite 1200
Los Angeles, CA 90012

Madera County District Attorney
209 West Yosemite Avenue
Madera, CA 93637

Marin County District Attorney
3501 Civic Center Drive, Room 130
San Rafael, CA 94903

Mariposa County District Attorney
5101 Jones Street, P.O. Box 730
Mariposa, CA 95338

Mendocino County District Attorney
100 North State Street, P.O. Box 1000
Ukiah, CA 95482

Merced County District Attorney
550 W. Main Street
Merced, CA 95340

Modoc County District Attorney
204 S. Court Street, Suite 202
Alturas, CA 96101

Mono County District Attorney
278 Main St
Bridgeport, CA 93517

Nevada County District Attorney
201 Commercial Street
Nevada City, CA 95959

Orange County District Attorney
401 Civic Center Drive
West Santa Ana, CA 92701

Placer County District Attorney
10810 Justice Center Drive, Suite 240
Roseville, CA 95678

Plumas County District Attorney
520 Main Street, Room 404
Quincy, CA 95971

San Benito County District Attorney
419 4th Street, Second Floor
Hollister, CA 95203

San Bernardino County District Attorney
303 West 3rd Street, 6th Floor
San Bernardino, CA 92415-0502

San Mateo County District Attorney
400 County Center, Third Floor
Redwood City, CA 94063

Shasta County District Attorney
1355 West Street
Redding, CA 96001

Sierra County District Attorney
100 Courthouse Square
Downieville, CA 95936

Siskiyou County District Attorney
P.O. Box 986
Yreka, CA 96097

Solano County District Attorney
675 Texas Street, Suite 4500
Fairfield, CA 94533

Stanislaus County District Attorney
832 12th Street, Suite 300
Modesto, CA 95354

Sutter County District Attorney
466 Second Street, Suite 102
Yuba City, CA 95991

Tehama County District Attorney
444 Oak Street, Room L
Red Bluff, CA 96080

Trinity County District Attorney
P.O. Box 310
Weaverville, CA 96093

Tuolumne County District Attorney
423 North Washington Street
Sonora, CA 95370

Yuba County District Attorney
215 Fifth Street
Marysville, CA 95901

Office of the City Attorney, Los Angeles
City Hall East
200 North Main Street
Los Angeles, CA 90012

Office of the City Attorney, Sacramento
915 I Street, 4th Floor
Sacramento, CA 95814

Office of the City Attorney, San Jose
200 East Santa Clara Street, 16th Floor
San Jose, CA 95113